

the united States District Courts

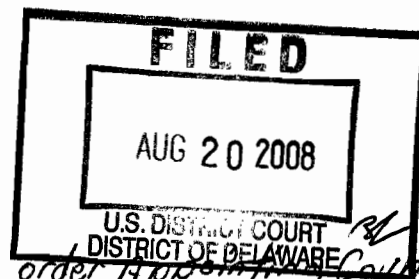
William F. DAVIS^{III}

Plaintiff

v.

Civil Action NO. 04-209-SLR

Correctional medical Services, motion for Appointment of Counsel
 First Correctional medical,
 nurse Betty Bradley, And
 Dr. Benjamin Robinson,
 Defendants.



Pursuant to 28 U.S.C. 1915(c)(1) Plaintiff moves for a order Appointing Counsel to represent him in this case. In support of this motion, Plaintiff States:

1. Plaintiff is unable to Afford Counsel. He has requested leave to proceed in forma Pauperis.
2. Plaintiff's imprisonment will greatly limit his ability to litigate. Plaintiff has limited Access to the law library and limited Knowledge of the law.
3. A trial in this case will likely involve conflicting testimony, and Counsel would better enable plain tiff to present evidence And Cross examine witnesses.
4. these factor are listed in montgomery v. Pinchak, 294 F.3d 492, 499 (3rd Cir. 2002). in Parham v. Johnson, 126 F.3d 454, 461 (3rd Cir 1997). Court of Appeals where a Plaintiff's Case appear to have merit and most of the aforementioned factors have been met.
5. the Defendants has a lawyer and I would like to have Counsel to help me with Credibility of Defendants are telling the truth and Cross-examination or require investigation in this Case and will need medical expert testimony be needed.

Date:

William F. DAVIS^{III}

Delaware Correctional Center

1181 Paddock Road

Smyrna, De 19977

Certificate of Service

I, William F. Davis III, hereby certify that I have served a true and correct cop(ies) of the attached: motion for Summary Judgment upon the following parties/person (s):

Heckler & Frabizzio
TO: Daniel LeMcKenty
800 Del Avenue, Suite 200
P.O. Box 128 Wilm, Del
19899-0128

TO: office of the Clerk
United States District Court
844 N. King Street Lock box 18
Wilm, Del 19801-3510

Marshall, Dennehey, Warner
Cokmas & Goffin
TO: Kevin J. Connors
1220 North Market Street
5th Floor P.O. Box 8888
Wilm, Del 19899-8888

TO: Patrick G. Raul
The Corporate Place
800 Del Ave Suite 200
P.O. Box 128
Wilm, Del 19899

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 17 day of August, 2008

William F. Davis III